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ATTORNEYS AT LAW
SAN FRANCISCO

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

THE FACEBOOK, INC. and MARK ZUCKERBERG

Plaintiffs,

v.

CONNECTU, INC. (formerly known as CONNECTU, LLC), PACIFIC NORTHWEST SOFTWARE, INC., WINSTON WILLIAMS, and WAYNE CHANG,

Defendants.

Case No. 5:07-CV-01389-JW

**DECLARATION OF KALAMA M. LUI-KWAN IN SUPPORT OF ADMINISTRATIVE MOTION BY NON-PARTIES R. GREGORY ROUSSEL AND FENWICK & WEST LLP TO SEAL DOCUMENTS**

I, Kalama M. Lui-Kwan, declare as follows:

1. I am an attorney duly admitted to practice in California and before this Court. I am associated with the law firm of Fenwick & West LLP ("Fenwick") and counsel for R. Gregory Roussel and Fenwick ("Non-Party Attorneys"). I have personal knowledge of the facts stated below and, if called as a witness, I could testify competently to such facts. I make this declaration pursuant to Civil L.R. 7-11 and 79-5(b), and in support of the Non-Party Attorneys' Administrative Motion to Seal Documents.

2. Good cause exists for sealing : (1) Notice Of Motion And Motion To Quash And For Protective Order; Memorandum Of Points And Authorities; (2) Declaration Of Kalama M. Lui-Kwan In Support Of Motion To Quash And For Protective Order; (3) [Proposed] Order Granting Motion To Quash And For Protective Order; (4) Miscellaneous Administrative Request By R. Gregory Roussel To Change Time Of Deposition Pursuant To Civil Local Rule 7-11; (5) Declaration Of Kalama M. Lui-Kwan In Support Of Miscellaneous Administrative Request By R. Gregory Roussel To Change Time Of Deposition Pursuant To Civil Local Rule 7-11; And (6) [Proposed] Order Granting Miscellaneous Administrative Request By R. Gregory Roussel To Change Time Of Deposition ("Non-Party Filings").

3. Upon information and belief, the parties in this action entered into, and the California Superior Court issued, a Stipulated Protective Order on January 23, 2006, which prohibits either party from filing in the public record any documents that have been designated as "Confidential" or "Highly Confidential" pursuant to the Protective Order. Although Fenwick is not a party to this action, it has represented plaintiff Facebook, Inc. ("Facebook") in connection with certain matters related to Facebook's settlement of this action.

4. The Non-Party Filings contain confidential information that is subject to the protection in the protective order. In light of the high profile nature of this case, and the parties' desire to keep the details of these documents private, Fenwick requests that this Administrative Request and its supporting papers remain sealed. The subject matter discussed in these papers includes commercially sensitive and confidential information that, if released to the general public, will adversely affect the parties to this litigation.

5. This Administrative Motion is being made pursuant to Civil L.R. 79-5, which requires a Court order to seal documents and does not permit sealing by stipulation.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 19th day of May 2008 in San Francisco, California.

By: /s/ Kalama M. Lui-Kwan
Kalama M. Lui-Kwan

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